

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT DELAWARE**

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	:		
ZAXCOM, INC.,	:		
	:		
Plaintiff,	:		
	:		C.A. No. 23-1245-JFM
v.	:		
	:		JURY TRIAL REQUESTED
RODE MICROPHONES, LLC. and	:		
FREEDMAN ELECTRONICS PTY LTD.,	:		
	:		
Defendants.	:		
	:		
-----	X		

MOTION FOR DEFAULT

Plaintiff moves this Honorable Court for entry of a default and an award of reasonable attorneys' fees and costs incurred in perfecting service on Rode and Freedman, for the reasons set forth in the accompanying Brief, which includes the Declaration of Sean O'Kelly, with supporting Exhibits A1 through A4, and Declaration of Rita C. Chipperson with supporting Exhibits B1 through B9. If the Court is not inclined to grant the above relief, Plaintiff moves for an order for limited discovery for information related to the relationship between Freedman and Rode. A proposed Order of Default accompanies this motion for the Court's consideration.

Dated: March 8, 2024

By: /s/ Sean T. O'Kelly
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Attorneys for Plaintiff Zaxcom, Inc.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 7.1.1

Pursuant to Local Rule 7.1.1, undersigned counsel for the moving party held a Rule 7.1.1 Conference with the opposing party on the matters set forth in the motion, and no agreement could be reached.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the electronic filing date of this document, a copy of the foregoing was served automatically via email by the Court's Case Management/Electronic Case Files (CM/ECF) upon all counsel of record including at least:

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Dated: March 8, 2024

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